

Portland Bicycle Advisory Committee

Working to Make Bicycling a Part of Daily Life in Portland

1001 SW 5th Avenue, Room 500
Portland OR 97204



November 21, 2019

Chris Warner
Portland Bureau of Transportation
1120 SW 5th Avenue, Suite 800
Portland, Oregon 97204

Re: Proposed Valet Zone on Flanders Greenway

Dear Director Warner:

The Hyatt Place/Allison Residences project (LU 19-145295 DZM) is a 23-story, quarter-block mixed-use hotel and residential building proposed at the southeast corner of NW 12th Avenue and Flanders Street in the Pearl District. The proposed building contains 170 hotel rooms and 110 apartments and includes a loading bay and several curbside valet zone spaces, but no on-site parking. The project is proposing to site the valet zone along the Flanders Street frontage, which has the potential to increase motor vehicle traffic and generate significant modal conflicts along the planned Flanders neighborhood greenway. To prevent this from occurring, the Portland Bicycle Advisory Committee requests that PBOT take meaningful steps to preserve the integrity of the future neighborhood greenway, including relocating the proposed valet zone to the 12th Avenue frontage.

PBOT is in the planning stages to implement a neighborhood greenway along Flanders Street, stretching from NW 24th Avenue to the Steel Bridge, and highlighted by the new Flanders Crossing bicycle/pedestrian bridge over I-405 that will be completed in late 2020-early 2021. Neighborhood greenways are low-volume, shared street facilities that provide low-stress mobility for vulnerable road users, and the Flanders project will close a critical gap in the regional multimodal network, allowing people to travel directly from the Eastbank Esplanade and Waterfront Park to major housing and employment centers in Northwest District and Central City. In fact, the City has projected that the Flanders Crossing could eventually see an estimated 9,100 daily walking and biking trips across the span.

Section 33.519.263.B.2.a in the Portland Zoning Code stipulates that “motor vehicle access to any parking area, loading area, or parking structure is not allowed” along Major City Bikeways in the Central City. However, this restriction does not extend to loading or valet zones within the public right-of-way. Previously, the mixed-use project had proposed locating both the valet zone and the loading bay on 12th Avenue. After a third party expressed concern that a loading zone would “create safety issues” on 12th, the applicant included a traffic response memo completed by Kittleson & Associates as part of the design review submittal (see attached). This memo justified moving the valet zone to Flanders based on existing daily traffic volumes (1,489 on Flanders at this block vs 3,036 on 12th). It also included peak hour volumes for Flanders Street (120 in weekday AM peak and 144 in weekday PM peak). The memo considers Flanders Street to function as a typical local street and states that its traffic volume is “consistent” with similar facilities.

However, Kittleson’s memo does not sufficiently acknowledge Flanders’ unique status as a neighborhood greenway. First, it fails to disclose the City’s traffic volume guidelines for greenway facilities. In a

[Frequently Asked Questions about Traffic Diversion document](#) posted online, PBOT has indicated the City “may consider” traffic diversion if daily volumes exceed 1,500 vehicles/day or 75 vehicles/peak hour and “shall consider” diversion if they exceed 2,000 vehicles/day or 100 vehicles/peak hour. The traffic data indicates that current peak hour volumes already exceed the City’s “shall” threshold for considering diversion. While the Flanders Greenway project is proposing diversion on two nearby blocks (between NW 14th-13th and NW 11-10th), it is unclear whether they will be sufficient to reduce traffic volumes on Flanders to satisfactory levels, especially if the new valet zone is implemented. Second, the memo does not adequately consider potential traffic safety issues caused by co-locating a high-intensity curbside use such as a valet zone along a major bicycle transportation facility. Hotel zones can often introduce dangerous conditions for people riding bicycles, such as double parking, erratic driving behavior, and other stressful interactions, with the bicycle lane on SW Broadway in downtown Portland being a notable example.

In closing, the BAC supports relocating the valet zone to the 12th Avenue frontage to reduce future traffic volumes and modal conflicts along the Flanders Greenway, and we look forward to working with PBOT on enacting citywide policies that prevent high-intensity curbside uses such as valet zones from being co-located on neighborhood greenways in the future. Additionally, the City should consider reserving the project’s Flanders Street frontage for street seating, landscaping, bicycle/scooter parking and other active pedestrian uses that are more compatible with the neighborhood greenway.

Respectfully submitted on behalf of Portland’s Bicycle Advisory Committee,



Alexandra Zimmermann, Chair
Bicycle Advisory Committee



David Stein, Vice-Chair
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